

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:	:	CHAPTER 7
	:	
DN REAL ESTATE SERVICES & ACQUISITIONS, LLC	:	
	:	
Debtor	:	CASE NO. 17-55587-PMB

**DEBTOR'S COUNSEL RESPONSE TO
UNITED STATES TRUSTEE'S OBJECTION TO
APPLICATION FOR COMPENSATION FOR ACCOUNTANT**

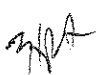
COMES NOW the undersigned Debtor's counsel and files this Response to the United States Trustee's ("UST") Objection (Doc. No. 141) (the "Objection") to the Application for Chapter 11 Legal fees Due to Debtor's Accountant (the "Accountant's Fee App") (Doc.No.131), showing the Court as follows:

The Objection makes the following objections to the Accountant's Fee App:

1. Fees after conversion are not recoverable.
2. The fee of \$2,250 for "2017 Tax Preparation" is unclear in its scope and timing.
3. The fee of \$650 paid by Debtor on June 20, 2018 requires further clarification and may be post-conversion as well.

To assist the Court and all parties to review the above matters, Debtor's counsel confirms that he has discussed the invoices with Accountant and signs below, under penalty of perjury that:

1. Accountant representative Cynthia K. Cordeiro revealed that the 2017 Tax form 1120S was filed on May 15, 2018. Therefore all work related to the tax return was completed before the conversion of the case on May 31, 2018.





2. Accountant representative delivered a copy of the invoice (attached hereto) to confirm that the \$650 paid directly to Accountant was for professional services rendered over the course of the Chapter 11 cases, over several months, all prior to the May 31, 2018 conversion date.

Debtor's counsel believes that the preparation of the monthly operating reports and the taxes are all standard and reasonable accounting duties that fall within the scope of the Order employing Accountant, signed by this Court on June 8, 2017 (Doc.No. 21). Nothing herein changes the disclosure that the \$650.00 payment was made by Debtor directly to Accountant and was done so before this Court knew of or approved of such disbursement.

The representations above are true and correct and made under penalty of perjury pursuant to 28 USC § 1746.

Dated: November 26, 2018


/s/ Howard P. Slomka
Howard P. Slomka
Georgia Bar #652875
Attorney for the Debtor
Slipakoff & Slomka, PC
Overlook III, Suite 1700
2859 Paces Ferry Rd, SE
Atlanta, GA 30339



Smith and Shin LLC

Invoice

4501 OLD SPARTANBURG RD
SUITE 15
TAYLORS, SC 29687

PAID
06/20/2018

Bill To

DN Real Estate Services & Acquisitions
2020 Howell Mill Rd NW Ste D199
Atlanta, GA 30318

Date

Invoice #

5/14/2018

7036

Date	Description	Amount
	Bookkeeping Services for September, 2017 - April, 2018 including preparation of MOR statements for court	650.00
Thank you for your business!		Total \$650.00

Handwritten signature

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	
)	CHAPTER 11
DN REAL ESTATE SERVICES &)	
ACQUISITIONS, LLC)	
Debtor,)	CASE NO.: 17-55587-PMB
)	

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the Debtor's Counsel's Response to United States Trustee's Objection to Second Fee Application in the above styled case by via electronic mail via the Court's ECF system, and not via U.S. Mail.

Dated: November 26, 2018

/s/ Howard P. Slomka, Esquire
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